



MONTGOMERY McCRACKEN

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August 29, 2023

VIA ECF Filing

The Honorable Lorna G. Schofield
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**Re: Alexandria v. Velrose Lingerie;
USDC, SDNY, C.A. No. 1:23-cv-5300**

Dear Judge Schofield:

I write on behalf of the Defendant in this matter, Velrose Lingerie, Inc. (“Velrose”)—with the agreement of Plaintiff’s counsel, Mars Khaimov—to request a 30-day extension of the existing deadlines in this case to allow the parties to continue their ongoing settlement discussions without the need for either party to incur additional litigation expenses.

The current deadline for Defendant’s response to the Complaint is September 15, 2023, with the Court directing that the Defendant file a pre-motion letter by August 30, 2023, if it intends to file a Motion to Dismiss. Plaintiff’s response to any such letter is now due by September 6, 2023, and the Court has scheduled a pre-trial conference for September 13, 2023. Defendant has previously requested (and been granted) one request for an extension of time to respond to the Complaint.

The requested 30-day extension would permit Defendant to answer, move or otherwise respond to the Complaint by Monday, October 16, 2023 (the 30th day falling on Sunday, October 15). Defendant’s deadline for filing a pre-motion letter for a Motion to Dismiss would be September 29, 2023, and Plaintiff’s response to any such letter would be due on October 6, 2023. The parties would submit a revised proposed Civil Case Management Plan and Scheduling Order, adjusting the deadlines in the current proposed Plan and Order, in advance of the rescheduled pretrial conference—which the parties request be rescheduled for a date in October.

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MICHAEL J. FEKETE, NEW JERSEY RESPONSIBLE PARTNER

Montgomery McCracken Walker & Rhoads LLP

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The parties thank the Court for its consideration of this request.

Respectfully yours,



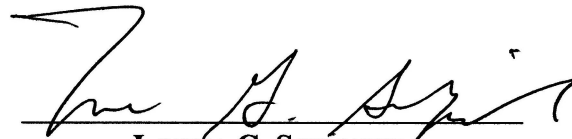
William K. Kennedy

WKK:

cc: Mars Khaimov, Esquire (via ECF filing and email: mars@khaimovlaw.com)

Application GRANTED. The initial pre-trial conference scheduled for September 13, 2023, is adjourned to **October 18, 2023, at 4:20 P.M.** If Defendant intends to file a motion to dismiss, it shall file a pre-motion letter by **September 29, 2023**, in accordance with the Court's Individual Rules. Plaintiff shall respond to Defendant's letter by **October 6, 2023**. By **October 11, 2023**, the parties shall file a revised proposed Civil Case Management Plan and joint letter as described in the June 26, 2023, Order. No further extensions of the initial pre-trial conference will be granted absent compelling circumstances.

Dated: August 30, 2023
New York, New York



LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE